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20 UNITED STATES BANKRUPTCY COURT  
21 NORTHERN DISTRICT OF CALIFORNIA  
22 SAN FRANCISCO DIVISION

23 In re ) Case No. 19-30088 (DM)  
24 PG&E CORPORATION, )  
25 and ) Chapter 11  
26 PACIFIC GAS AND ELECTRIC ) (Lead Case–Jointly Administered)  
27 COMPANY )  
28 Debtors )  
29  
30 Affects: )  
31  PG&E Corporation ) **REQUEST FOR RELIEF UPON**  
32  Pacific Gas & Electric Company ) **DEFAULT IN SUPPORT OF MOTION**  
33  Both Debtors ) **FOR ORDER AUTHORIZING**  
34 \* All papers shall be filed in the Lead ) **WITHDRAWAL OF COUNSEL**  
35 Case, No. 19-30088 (DM). )  
36 ) [RE: Dkt. Nos. 11668, 11669, 11670, and 11671]  
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## **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 Under B.L.R. 9014-1(b)(4), Robins Cloud LP (“Firm”) hereby requests that Court enter an  
3 order by default on its Motion for Order Authorizing Withdrawal of Counsel to the Estate of Suiko  
4 Grant (“Creditor”)<sup>1</sup>, Dkt. No. 11668 (“Motion”).

## **RELIEF REQUESTED IN THE MOTION**

6 The Motion seeks an order authorizing the Firm to withdraw as counsel of record to the  
7 Creditor.

## **NOTICE AND SERVICE**

9 A Notice and Opportunity for Hearing on Motion for Order Authorizing Withdraw of  
10 Counsel to the Estate of Arthur Grant was filed concurrently with the Motion on December 6, 2021,  
11 Dkt. No. 11670 (“Notice and Opportunity for Hearing”). The Motion, the supporting declaration of  
12 Robert Bryson, Dkt. No. 11669, and the Notice and Opportunity for Hearing were served as  
13 described in the Certificate of Service filed on December 6, 2021, Dkt. No. 11671.

14 The deadline to file a response or opposition to the Motion has passed, and no opposition has  
15 been filed with the Court or received by the Firm.

## **DECLARATION OF NO OPPOSITION RECEIVED**

17 The undersigned hereby declares, pursuant to 28 U.S.C. §1746, under penalty of perjury,  
18 that:

19 1. I am an individual over 18 years of age and competent to make this Declaration.

20        2.        I am the founder of Grimshaw Law Group, P.C., and an attorney at law duly  
21 admitted to practice before all courts of the State of California and the United States District C  
22 for the Northern District of California.

23       3.       I am counsel for the law firm of Robins Cloud LP (the “Firm”), attorneys of record  
24 for the Estate of Suiko Grant (“Creditor”).<sup>2</sup>

26 <sup>1</sup> Robins Cloud LLP retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other  
27 things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client  
28 relationship with Creditor. Declaration of Robert Bryson in Support of Motion for Order Authorizing  
Withdrawal of Counsel (“Bryson Decl.”), ¶2, fn.1.

<sup>28</sup> <sup>2</sup> Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.

1 4. I have reviewed the Court's docket in these Chapter 11 Cases and determined that  
2 no response or opposition has been filed with respect to the Motion.

3           5.        A proposed order will be lodged concurrently as provided for in B.L.R. 9014-  
4 1(b)(3)(A).

5 WHEREFORE, the Firm hereby requests that the Court enter the proposed order filed  
6 concurrently herewith granting the Motion for the reasons set forth therein.

7 Executed on January 4, 2022.

## GRIMSHAW LAW GROUP, P.C.

/s/ Matthew W. Grimshaw

Matthew W. Grimshaw

Attorneys for Robins Cloud LLP

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 4, 2022, I caused the forgoing **REQUEST FOR RELIEF UPON DEFAULT IN SUPPORT OF MOTION FOR ORDER AUTHORIZING WITHDRAWAL OF COUNSEL** to be electronically filed with the Clerk of the Court using the CM/ECF system, which, in turn, caused a notification to be sent to the interested parties, with the exception of the Estate of Suiko Grant.

I further certify that, on the same date, I caused the foregoing document to be sent via first-class mail, postage prepaid, to the following interested party:

The Estate of Suiko Grant  
4921 Crestmont Drive  
San Francisco, CA 94131

The Estate of Suiko Grant  
937 Sundown Trail  
Santa Rosa, CA 95404

/s/ Matthew W. Grimshaw  
MATTHEW W. GRIMSHAW